



1. You/Your. The terms “you” and “your” mean Plaintiff and his or her agents, attorneys, representatives, employees and all other persons acting or purporting to act on his or her behalf.

2. Document. The term “document” is defined to include papers, files, records, notes, memoranda, contracts, agreements, diaries, daytimers, calendars, bulletins, pamphlets, manuals, books, telephone messages, handwritten, typed and/or printed matter, graphs, charts, exhibits, sketches, blueprints, specifications, calculations, spreadsheets, diagrams, reports, maps, plats, and affidavits (whether signed or unsigned), and to be otherwise synonymous in meaning and equal in scope to the usage of this term in the rules of civil procedure. A draft or non-identical copy is a separate document within the meaning of this term.

3. Communication. The term “communication” means communications in any form, including, but not limited to, correspondence, telegrams, cover letters, facsimile transmission sheets, notes of conversations, electronic mail and text messages.

4. Material. The term “material” means tangible things and electronic data and files in any form, including, but not limited to, documents, communications, facsimiles, things, objects, photographs, videotapes, recordings, drawings, schematics, models, electronic images, digital images, compact disks, computer disks and files, items stored in or generated by computers and items stored in or produced by cellular phones.

5. Identify. The term “identify” means to provide the following:

a. With respect to health care providers, the name and type, office address and office telephone number of the provider, along with the name of the practice with which he or she is affiliated;

b. With respect to other persons, the name, residential address, telephone number and the present or last place of employment of the person and the address and telephone number thereof;

c. With respect to entities, the name, business address and telephone number of the entity; and

d. With respect to materials, to provide a detailed description of the material, to state when and where the material was made and to identify all persons and entities who made or generated the material or have possession, custody or control of the material or access thereto.

6. Concerning or In Regard to. The terms “concerning” or “in regard to” mean relating to, referring to, describing, evidencing, reflecting or construing.

7. And/Or. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

8. Number. The use of the singular form of any word includes the plural and *vice versa*.

9. Incident. The term “incident” means all actions, omissions, events and circumstances upon which your claims herein are based.

### **INSTRUCTIONS**

The following instructions apply to all discovery requests:

1. Supplementation of Responses. These interrogatories are continuing and you must supplement your responses hereto as required by the rules of civil procedure.

2. Assertions of Privilege or Work Product. If you claim any responsive material is privileged or subject to protection as trial-preparation material, you must expressly assert the claim and otherwise comply with the rules of civil procedure in making the claim.

3. Lost or Missing Materials. If you claim any responsive material is missing or has been lost, please state the last time the material was in your possession, state all efforts you have made to locate the material, identifying all persons and entities you have contacted in that regard, and identify all persons or entities who had possession of the material at any time.

4. Destroyed or Deleted Materials. If you claim any responsive material was destroyed or deleted, please state the date and manner of its destruction or deletion, state the reason for its destruction or deletion, state where the material was located before its destruction, list all computers in which the material was stored and identify all persons or entities who had possession of the material at any time.

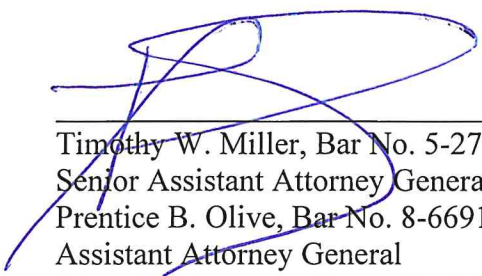
### **REQUESTS FOR PRODUCTION**

Please produce all materials described below that are in your possession, custody or control.

**REQUEST NO. 1:** All documents or other evidentiary material upon which your computation of each category of damages alleged by you is based, including, but not limited to, the items listed in your response to Defendant's First Set of Interrogatories, No. 4, as well as all materials bearing on the nature and extent of the damages suffered.

### **RESPONSE:**

DATED this 9 day of August, 2023.



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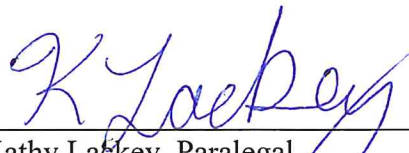
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

The undersigned does certify that on the 9<sup>th</sup> day of August, 2023, a true and correct copy of the foregoing **Defendant's Second Requests for Production to Plaintiff Cumani** was served as indicated on the following:

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Kathy Lackey, Paralegal  
Office of the Wyoming Attorney General